

Exhibit C

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

SCOTT DENING,

CIVIL ACTION

Plaintiff,

No. 1:23-cv-1117

v.

Hon. Hala Y. Jarbou

GLOBE LIFE AMERICAN INCOME
DIVISION a/k/a/ AMERICAN INCOME
LIFE INSURANCE COMPANY, and
GLOBE LIFE INC.

Defendants.

JURY TRIAL DEMANDED

PLAINTIFF'S INITIAL DISCLOSURES

Plaintiff, Scott Dehning, through his undersigned counsel, makes her initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedures as follows:

I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION

A. Liability

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| 1. Scott Dehning
Lansing, MI 48823 | Plaintiff has information concerning the allegations in his complaint and Defendants' Counterclaim. |
| 2. Dominic Bertini
Waco, TX 76710 | Mr. Bertini has information concerning the allegations in Plaintiff's complaint and . Defendants' Counterclaim. |
| 3. Rob Gray
Waco, TX 76710 | Mr. Gray has information concerning the allegations in Plaintiff's complaint and Defendants' counterclaim. |
| 4. Jason Blood
530 W. Allegan St.
Lansing, MI 48933 | Mr. Blood is believed to have information concerning Plaintiff's reports of Defendants' unethical and fraudulent business practices. |

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| 5. | Zach Hart
Lansing, MI | Mr. Hart is believed to have information regarding the allegations in Plaintiff's complaint. |
| 6. | Sonia Kury
1200 Wooded Acres
Waco, TX 76710 | Ms. Kury is believed to have information regarding the allegations in Plaintiff's complaint. |
| 7. | Steve Greer
1200 Wooded Acres
Waco, TX 76710 | Mr. Greer is believed to have information regarding the allegations in Plaintiff's complaint and Defendants' Counterclaim. |
| 8. | David Zophin
1200 Wooded Acres
Waco, TX 76710 | Mr. Zophin is believed to have information regarding the allegations in Plaintiff's complaint and Defendants' Counterclaim. |
| 9. | Debbie Gamble
1200 Wooded Acres
Waco, TX 76710 | Ms. Gamble is believed to have information regarding the allegations in Plaintiff's complaint and Defendants' Counterclaim. |
| 10. | Mike Laramie
1200 Wooded Acres
Waco, TX 76710 | Mr. Laramie is believed to have information regarding the allegations in Plaintiff's complaint. |
| 11. | Joel Scarboro
1200 Wooded Acres
Waco, TX 76710 | Mr. Scarboro is believed to have information regarding the allegations in Plaintiff's complaint and Defendants' Counterclaim. |
| 12. | Chad Rigsby
1200 Wooded Acres
Waco, TX 76710 | Mr. Rigsby is believed to have information regarding Defendants' Counterclaim. |

B. Damages

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| 1. | Plaintiff
Lansing, MI 48823 | Plaintiff has information relating to his damages as a result of wrongful termination. |
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II. DOCUMENTS PLAINTIFF MAY USE IN SUPPORT OF HIS CLAIMS

1. Documents and correspondence currently in possession and control of Defendants relating to Plaintiff's investigations of unethical and fraudulent business practices during his employment with Defendants;
2. Documents and correspondence currently in possession and control of Defendants relating to other reports of unethical and fraudulent business practices;
3. Documents and correspondence currently in possession and control of Defendants relating to investigations of unethical and fraudulent business practices by government agencies including but not limited to Department of Insurance and Department of Justice;
4. Documents and correspondence currently in possession and control of Defendants relating to Plaintiff's employment;
5. Documents and correspondence currently in possession and control of Defendants relating to the allegations raised in Defendants' Counterclaim;
6. Documents and correspondence between Plaintiff and his supervisors relating to the reporting of unethical business practices and fraud; and,
7. Documents and correspondence relating to the employment and termination of Dominic Bertini, Rob Gray, Chris Selejan, and Zach Hart.

III. DAMAGES AND SUPPORTING DOCUMENTATION

1. Compensation information generated by Defendants regarding Plaintiff's income;
2. Compensation information generated by Defendants regarding Plaintiff's co-workers income;
3. Plaintiff's bank statements, tax returns, or other documentation relating to Plaintiff's income.

Respectfully submitted,

Williamson Law LLC

/s/ Amy N. Williamson

Amy N. Williamson

PA I.D. No. 90657

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CERTIFICATE OF SERVICE

I hereby certify on this 29th day of , 2024 I served a copy of the foregoing *Plaintiff's Initial Disclosures* via electronic mailing upon the following:

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/s/ Amy N. Williamson
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